

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JESUS CONCEPCION,
a/k/a "Mr. C.,"

Defendant.

PROTECTIVE ORDER

S1 21 Cr. 479 (LAP)

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Camille Fletcher, Jacqueline Kelly, and Alexandra Messiter, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material"), and providing additional protections to a designated subset of the 3500 Material which has been classified as "Attorney's Eyes Only," (the "Attorney's Eyes Only 3500 Material"), made on consent of defense counsel, and based on the Court's independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) defense counsel and the defendant are precluded from disseminating any of the 3500 Material to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendant is precluded from taking or keeping any paper copies of the 3500 Material with them into any jail facility, whether before, during, or after trial; except that the defendant may review paper copies of the 3500 Material in

the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense.

IT IS FURTHER ORDERED that any 3500 Materials having been clearly designated as "Attorney's Eyes Only 3500 Material," including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendant, and may be disclosed only to defense counsel and to any paralegal or staff employed by the defense, until May 15, 2023.

IT IS FURTHER ORDERED that the defendant, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity of any witnesses, including civilian witnesses or victim witnesses referenced in the Attorney Eyes' Only 3500 Material, until April 17, 2023.

Dated: New York, New York
March 23, 2023



THE HONORABLE LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE